

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

07-CV-11387 (Judge Cote)

v.

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

BRIAN N. LINES, *et al.*,

Defendants.

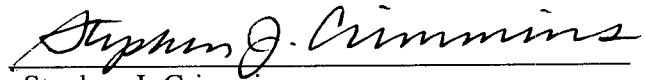
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Stephen J. Crimmins, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name: Rebecca A. Beynon
Firm Name: Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.
Address: 1615 M Street, N.W., Suite 400
Washington, D.C. 20036
Phone Number: 202-326-7934
Fax Number: 202-326-7999

Rebecca A. Beynon is a member in good standing of the Bars of the State of Texas and the District of Columbia. There are no pending disciplinary proceedings against Rebecca A. Beynon in any State or Federal Court.

Dated: June 19, 2008

Respectfully submitted,

A handwritten signature in dark ink, reading "Stephen J. Crimmins", is written over a horizontal line.

Stephen J. Crimmins
SDNY Bar Code: SC-2714
MAYER BROWN LLP
1909 K Street, NW
Washington, D.C. 20006-1101
202-263-3883

Counsel for Scott G.S. Lines

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

June 17, 2008

Re: Rebecca A. Beynon, State Bar Number 00790303

To Whom It May Concern:

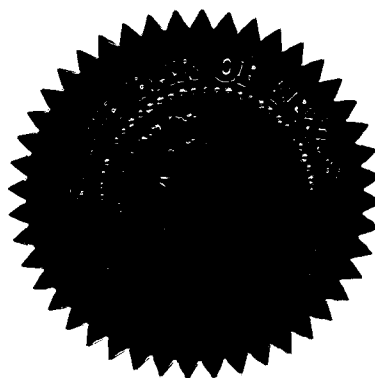
This is to certify that Ms. Rebecca A. Beynon was licensed to practice law in Texas on November 4, 1994, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; and is not presently under either administrative or disciplinary suspension. However, because the attorney has chosen an exemption from Minimum Continuing Legal Education, she is not eligible to practice in the State of Texas.

No previous disciplinary sanctions have been entered against Ms. Beynon's law license.

Sincerely,

John A. Neal
Chief Disciplinary Counsel

JN/ss





District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

REBECCA A. BEYNON

was on the 12TH day of JULY, 1996
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on June
18, 2008.

GARLAND PINKSTON, JR., CLERK

By: A. Charles
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

07-CV-11387 (Judge Cote)

v.

BRIAN N. LINES, *et al.*,

Defendants.

**AFFIDAVIT OF STEPHEN J.
CRIMMINS IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

District of Columbia) ss:

Stephen J. Crimmins, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Mayer Brown LLP, counsel for Defendant Scott G.S. Lines in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants Lines Overseas Management Ltd, LOM Capital Ltd., LOM Securities (Bermuda) Ltd., LOM Securities (Cayman) Ltd., and LOM Securities (Bahamas) Ltd. ("LOM Defendants") motion to admit Rebecca A. Beynon as counsel *pro hac vice* to represent the LOM Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on March 6, 1974. I was admitted to the bar of the United States District Court for the Southern District of New York on August 6, 1974, and am in good standing with this Court. I have known Ms. Beynon since October 2003.

4. Ms. Beynon is a partner at Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C., in Washington, D.C.

5. I have found Ms. Beynon to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

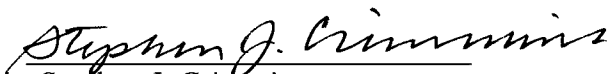
6. Accordingly, I am pleased to move the admission of Rebecca A. Beynon, *pro hac vice*.

7. I respectfully submit a proposed order granting the motion to admit Rebecca A. Beynon, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Rebecca A. Beynon, *pro hac vice*, to represent the LOM Defendants in the above captioned matter, be granted.


Dated: June 19, 2008
District of Columbia

Respectfully submitted,


Stephen J. Crimmins
SDNY Bar Code: SC-2714

District of Columbia: SS
Subscribed and Sworn to before me

this 19 day of June, 2008.


Notary Public, D.C.

My commission expires _____

SONIA BERNARD
Notary Public, District of Columbia
My Commission Expires March 14, 2011

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

07-CV-11387 (Judge Cote)

v.

**ORDER FOR ADMISSION
PRO HAC VICE ON
WRITTEN MOTION**

BRIAN N. LINES, *et al.*,

Defendants.

Upon the motion of Stephen J. Crimmins, attorney for Defendant Scott G.S. Lines and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Rebecca A. Beynon

Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.

1615 M Street, N.W., Suite 400

Washington, D.C. 20036

Tel.: 202-326-7934 / Fax: 202-326-7999

rbeynon@khhte.com

is admitted to practice *pro hac vice* as counsel for Defendants Lines Overseas Management Ltd., LOM Capital Ltd., LOM Securities (Bermuda) Ltd., LOM Securities (Cayman) Ltd., and LOM Securities (Bahamas) Ltd. ("LOM Defendants") in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately

apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:
New York, New York

United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION TO ADMIT COUNSEL *PRO HAC VICE* and AFFIDAVIT OF STEPHEN J. CRIMMINS IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE* was served via overnight mail, on this 24th day of June, 2008.

David Williams
Mark A. Adler
Securities and Exchange Commission
Division of Enforcement
100 F Street, N.E.
Washington, D.C. 20549-4030
Telephone: 202-551-4402
Facsimile: 202-772-9245

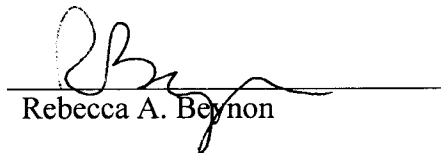
Counsel for Plaintiff Securities and Exchange Commission

Philip M. Smith
Winston & Strawn LLP
200 Park Avenue
New York, NY 10166
Telephone: 212-294-6700
Facsimile: 212-294-4700

Counsel for defendant Brian N. Lines

Stephen J. Crimmins
Mayer Brown LLP
1909 K Street, N.W.
Eighth Floor, Suite 804
Washington, D.C. 20006-1101
Telephone: 202-263-3883
Facsimile: 202-762-4888

Counsel for defendant Scott Lines


Rebecca A. Beynon